



OFFICE OF EQUITY
COUNTY OF SONOMA

DRAFT #1 - LANGUAGE ACCESS PLAN

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*County of Sonoma Language Access & Language Justice Project
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DOCUMENT INFORMATION

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ADMINISTRATIVE ENTITY

Office of Equity, County of Sonoma

RELATED REGULATORY REFERENCES

1. Presidential Executive Order 13166
2. 45 CFR 92.101
3. Americans With Disabilities Act
4. Dymally-Alatorre Bilingual Services Act, Cal. Gov't Code §§ 7290–7299.8
5. Cal. Code Regs. tit. 9, § 3610(b)(1)
6. Cal. Code Regs. tit. 9, § 3620(h)(A)(2)
7. Cal. Code Regs. tit. 9, § 3650 (a)(1); (a)(5)(A)(B)
8. Cal. Gov't Code §§ 11018, 11410.60(c)(3)
9. Cal. Gov't Code § 11135(a)(d)

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Language Access Plan and Policy Draft 1 v2

LANGUAGE ACCESS PLAN FOR THE COUNTY OF SONOMA 2024-

2026

INTRODUCTION

The County of Sonoma Language Access Plan 2024-2026 was developed as part of a year-long project in 2023, led by the Office of Equity. This project aimed to improve the provision of language access to County residents who do not speak English well enough to interact meaningfully with the County government. The provision of language access is required by Federal and State Law.

The Language Access Project assessed the language access needs, coverage, and gaps in the County of Sonoma, through: analysis of language and other demographic data; comparison of the County's legal and regulatory framework for language access with federal, California, and municipal laws, regulations, policies, and plans; consultations with County of Sonoma employees and leaders; and, most importantly, consultations with community members representing the linguistically diverse population of the County of Sonoma.

PURPOSE

This Language Access plan will guide the implementation of the County of Sonoma Language Access Policy. This provides detailed goals, objectives, and benchmarks for the implementation of the County of Sonoma Language Access Policy. It details the lead and responsible county agencies, actions to be taken to implement the Plan, and timelines for these actions.

SCOPE

Countywide; all County of Sonoma agencies.

VALUES

The County of Sonoma Language Access Plan and Policy (LAPP) embodies and carries out the following values of the Office of Equity (OOE) of the County of Sonoma:¹

- **Anti-Racism:** The LAPP reinforces the OOE value of anti-racism by enhancing countywide efforts to more meaningfully and effectively communicate and engage with minoritized and indigenized residents of the County, in particular those whose identity includes a language other than English as their language of communication;
- **Design to the Margins:** The LAPP explicitly addresses a key social factor in the marginalization of residents of the County: home language. Moreover, as home language intersects with multiple other identity markers associated with systematic marginalization, including race, ethnicity, documentation status, and social and economic standing, the provision of effective and meaningful language access represents a deliberate and intentional step towards addressing these markers. Finally, this LAPP reflects extensive engagement with marginalized language communities in the County of Sonoma, and incorporates the feedback, advice, and perspectives of representatives of these communities.²
- **Collective and Transformative Leadership:** The LAPP incorporates lessons learned, feedback, and insights from across the government of the County of Sonoma.
- **Authentic Collaboration:** The LAPP exemplifies authentic collaboration because it was developed with significant input from community members and community-based organizations in the County.
- **Transparency and Accountability:** The LAPP explicitly includes provisions and procedures for transparency and accountability in the provision of language access to the residents of the County who need such access to equitably participate in the full civic life of the County.

DEFINITIONS

ADA (Americans with Disabilities Act) – The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. In the context of this study, the ADA applies to the provision of ASL (American Sign Language) interpretation.

¹ For the full statement of Values of the Office of Equity of the County of Sonoma, see <https://sonomacounty.ca.gov/administrative-support-and-fiscal-services/office-of-equity/vision-mission-and-values>

² See Report B-4: Qualitative Findings on Community Outreach (Focus Groups)

Bilingual Employee – A County employee who is proficient in the English language and a language other than English that is spoken by Limited English Persons (LEP) who are residents of the County of Sonoma. The County of Sonoma maintains policies and procedures to determine the ability of Bilingual Employees (e.g., Basic or Fluent) to provide language access. Employees may receive a premium for using bilingual skills as outlined in the applicable memorandum of understanding or the Salary Resolution.

Certified Deaf Interpreter (CDI): Holders of this certification are deaf or hard of hearing and have demonstrated knowledge and understanding of interpreting, deafness, the Deaf community, and Deaf culture. Holders have specialized training and/or experience in the use of gesture, mime, props, drawings and other tools to enhance communication. Holders possess native or near-native fluency in American Sign Language and are recommended for a broad range of assignments where an interpreter who is deaf or hard-of-hearing would be beneficial. (Source: Registry of Interpreters for the Deaf)

County – the County of Sonoma

Dymally-Alatorre Bilingual Services Act (California Government Code Section 7290 et. Seq.) – An act signed into law in 1973 to eliminate language barriers that prevent LEP individuals from having equal access to public services. This Act mandates that state and local agencies directly involved in the furnishing of information or the rendering of services to the public utilize language services to enable access to any LEP population that meets the threshold of 5% or more of the total population.

Deaf or Hard-of-Hearing Individual (DHH Individual) – Someone who is limited in their ability to communicate due to total or partial hearing loss. Deaf and Hard of Hearing individuals may use American Sign Language as their native language, but Deaf and Hard of Hearing individuals from outside the United States will likely use another signed language. In the context of language access, Deaf individuals may require an American Sign Language (ASL) interpreter and/or Certified Deaf Interpreter (CDI), or an interpreter of another signed language.

EO 13166 – An executive order issued in August 2000 by President William J. Clinton that clarifies the requirements for LEP individuals under Title VI of the Civil Rights Act. Specifically, EO 13166 clarifies the prohibition on national origin discrimination in Title VI as extending to discrimination based on the language status of the individual. The order requires federal agencies and any recipients of federal aid to implement policies and procedures to ensure LEP individuals can meaningfully access the services of said agencies, at no cost to the LEP individual.

Interpreting – Oral language assistance provided by an interpreter either in-person or via a telephone interpretation service.

Relay Interpreting: - Interpreting from language A into language B, and then from language B into language C. For example, for many Indigenous Languages of Mexico and Central America, there are very few interpreters capable of rendering the interpreting into English. In such cases, Relay Interpreting is required, where one interpreter will work from Chatino (for example) into Spanish, and a second interpreter from Spanish into English. Relay interpreting may also be required with Deaf and Hard of Hearing individuals, when 1) the Deaf or Hard of Hearing individual signs in a language other than American Sign Language, such as Nicaraguan or Mexican Sign Language; 2) the Deaf or Hard of Hearing Individual does not have sufficient proficiency in American Sign Language (ASL) to communicate through an ASL interpreter. In these cases, the best practice is to engage a Certified Deaf Interpreter, who interprets to and from ASL, and an ASL interpreter, who provides interpreting into and out of English.

Qualified Interpreter – For spoken languages, a Qualified interpreter for a Limited English Proficient individual means an interpreter who via a remote interpreting service or an on-site appearance:

1. Has demonstrated proficiency in speaking and understanding both spoken English and at least one other spoken language;
2. Is able to interpret effectively, accurately, and impartially to and from such language(s) and English (or another language, in the case of Relay Interpreting), using any necessary specialized vocabulary or terms without changes, omissions, or additions and while preserving the tone, sentiment, and emotional level of the original oral statement; and
3. Adheres to generally accepted interpreter ethics principles, including client confidentiality.

For signed languages, a Qualified Interpreter means an interpreter possessing a valid certification from the Registry of Interpreters for the Deaf as an ASL Interpreter or a Certified Deaf Interpreter.

LAPP (Language Access Plan and Policy) – The Language Access Plan and Policy provides a set of standard language justice and access operating guidelines for the County of Sonoma, or “best practices,” and standards to ensure that local partners shall provide culturally and linguistically responsive language services and may be used by County staff to close language and accessibility gaps in services.

LEP Individual – Someone who does not speak English as their primary language and is limited in their ability to read, write, speak or understand English. LEP status is defined in Presidential Executive Order 13166.³ Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context specific; for example, an individual who has sufficient English skills for daily communication may need language access during a medical appointment, or at a disaster recovery center, among other contexts. An individual may have sufficient language skills to communicate basic information (name, address, etc.) but may not have sufficient skills to communicate detailed information in English.

LSC (language services company) and LSP (language services provider) – A company that provides professional language services including translation, interpretation, localization, etc. (Source: ASTM F3130-2018, Standard Practice for Language Service Companies).

Localization – the process whereby a website, service, or product is adapted to a specific culture and language.

Meaningful Access – Language assistance that results in accurate, timely, and effective communication at no cost to the individual who is limited English proficient. Meaningful access means access that is not significantly restricted, delayed or inferior as compared to programs or services provided to persons who are proficient in the English language.

OPI (Over the Phone Interpretation, otherwise known as telephonic interpreting or OPI for short) – A 3-way conference call among an interpreter, an LEP individual, and an English-speaking second party.

Sight-Translation – The oral rendering of what is written in one (source) language into another (target) language without adding, omitting or distorting meaning. For example, an interpreter might be asked to provide sight-translation of a form or notice from a County agency.

Signed Language – A language where information is conveyed through the use of physical signs, through the use of the hands, facial expression, body position, and other non-verbal means. Signed languages include American Sign Language (ASL), and its dialects, which are the primary signed language among American Deaf and Hard of Hearing individuals. Other signed languages, such as British Sign Language (BSL), Nicaraguan Sign Language (NSL), are linguistically distinct languages and are not mutually intelligible with ASL.

³ See <https://www.justice.gov/crt/executive-order-13166>

Substantial Number of LEP Individuals – A group of LEP County residents who speak a shared language other than English and numbers at least 5% of the total County population (in accordance with State language threshold standards) and/or numbers at least 10,000 individuals (in accordance with federal language threshold guidance).

Translation – Written language assistance provided by a translator.

Qualified Translator – Qualified translator means a translator who:

1. Has demonstrated proficiency in writing and understanding both written English and at least one other written non-English language;
2. Is able to translate effectively, accurately, and impartially to and from such language(s) and English, using any necessary specialized vocabulary or terms without changes, omissions, or additions and while preserving the tone, sentiment, and emotional level of the original written statement; and,
3. Adheres to generally accepted translator ethics principles, including client confidentiality.

Vital Documents – Any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is “vital” depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

Examples of vital documents include applications for services and benefits, consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; and letters or notices that require a response from the beneficiary or client.

“Vital document” is a term used in federal regulation, including EO 13166 and 45 CFR 92.101. While California state legislation establishing the state right to language access (the Dymally-Alatorre Bilingual Services Act) does not use this exact term, it requires state and local agencies to provide meaningful access to the same types of content (i.e., information that affects rights, duties, or privileges) and applies a slightly broader scope to include any written materials that solicit information from the LEP individual or provide them with information. In this document, the term “vital documents” will refer to any document that meets either the federal or state standard for content that the city is required to provide to LEP individuals in a non-English language.

VRI - Video Remote Interpreting (VRI) is a video telecommunication service that uses devices such as web cameras or videophones to provide sign language or spoken language interpreting services.

LEAD & RESPONSIBLE AGENCIES

AGENCY ROLE	DEPARTMENT/AGENCY
LAPP Administrator	Office of Equity (OOE)
LAPP Resourcing	TBD
LAPP Data Collection	OOE
LAPP Reporting	OOE
LAPP Complaints investigation	TBD

SITUATION OVERVIEW

The County of Sonoma is linguistically diverse. According to the 2020 US Census, at least 12% of the residents of the County of Sonoma, aged 5 years and older – more than 49,000 people – speak a language other than English at home and speak English less than “very well,” thus meeting the definition of Limited English Proficient (LEP). More than 40,000 of these individuals speak Spanish, comprising 10% of the County’s population, and more than 75 other languages are spoken by County residents.⁴ County residents who do not speak English well enough to engage with County agencies, or who do not speak English at all, report significant language barriers, including: a lack of interpreters in their languages; discrimination based on Limited English Proficient status, including the denial of interpreters when requested; poor quality translations in their languages, leaving residents confused about how to access County services; and for speakers of Indigenous Languages

⁴ See Report A-3: Demographic Analysis of linguistically diverse communities in Sonoma County and STATE OF CALIFORNIA, COUNTY, AND MUNICIPAL LANGUAGE ACCESS LAWS and regulations

of Mexico, Guatemala, and other countries of Central America, misidentification as Spanish speakers, sometimes over their specific objections to this misidentification.

Language access is mandated by federal and California laws and regulations. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on national origin and, as elaborated in Presidential Executive Order 13166, Title VI requires recipients of Federal funding to provide meaningful language access to LEP individuals whom they serve. For the Deaf and Hard of Hearing, language access is mandated under the federal Americans with Disabilities Act. The California Dymally-Alatorre Bilingual Services Act, Government Code §7290 et seq. requires California State and local public agencies serving a substantial number of limited English-speaking people to provide services and materials in the language(s) spoken by those persons. California Government Code §11135 et seq. is parallel to the federal Title VI, but broader and includes more protected classes. It prohibits discrimination on the basis of: race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability. The term “ethnic group identification” is defined by state regulations as including linguistic characteristics or language.

Therefore, it is a legal obligation of the County of Sonoma and its agencies to provide language access to Limited English Proficient and Deaf and Hard of Hearing individuals seeking County services or interacting with County agencies. As the Deaf and Hard of Hearing individuals are covered under the American with Disabilities Act, the focus of the Language Access Plan and Policy is on LEP individuals.

CURRENT COUNTY INVESTMENT

Currently, there are 740 County employees certified as Bilingual and receiving a bilingual premium. Bilingual premiums vary based on the level of proficiency (basic and fluent) and applicable Salary Resolution or Memorandum of Understanding.

The County also has Blanket Purchase Orders (BPOs) for interpretation and translation services with approximately 13 different companies. Total spending across these companies is just under \$1.1 million from 2020 to present. Additionally, individual departments may have their own contracts for translation and interpretation services not reflected in the BPO costs.

Thus, the current costs for County language access are large and a deeper fiscal analysis is needed to ascertain the total annual costs being spent on language access.

BEST PRACTICES IDENTIFIED

- Hiring more bilingual and culturally competent county staff across departments
- Providing professional native language interpretation services, whether in-person or phone-based
- Translating key documents, forms, and signage into residents' languages
- Ensuring emergency alerts and disaster communications go out in most commonly spoken languages
- Creating community liaison roles from communities experiencing marginalization to inform cultural sensitivity
- Conducting public outreach and meetings in partnership with trusted community organizations
- Supporting cultural events and community gathering spaces
- Accommodating language needs proactively rather than relying on residents to self-advocate
- Incorporating visual, audio and verbal modes to increase accessibility
- Compensating community members for interpretation/translation assistance
- Expanding availability of language access law trainings
- Adding bilingual options across communication channels (websites, over-the-phone interpreting (OPI), virtual remote interpreting (VRI), etc.)

In summary, through professional inclusive practices around staffing, contracting, translation, interpretation, meeting facilitation and information delivery, Sonoma County agencies can grow in literacy, break dependence on children, family members, and other informal translators and interpreters, ensure equitable emergency information flows, validate cultural communication preferences, and ultimately empower residents across languages.

SPECIFIC GAPS IDENTIFIED AND RECOMMENDATIONS:

ADMINISTRATIVE GAPS:

Administrative gaps were identified through examining County language access policies and procedures, to the extent that these exist, as well as through interviews with County Supervisors and focus groups with County language access leads, bilingual staff, staff and contracted interpreters.

1. **The County lacks centralized language access resources, including:**
 - a. **Technical assistance on language access for County agencies; and,**

b. Standardized training in language access for County personnel.

Recommendation: The County should designate a County Language Access Authority, located in an agency with a clear understanding of language access requirements and processes. The Office of Equity meets those criteria, and would be well positioned to work across the County government to provide:

- Technical assistance to all County agencies regarding language access
- Staff training on language access for County personnel.

Cost: 1 FTE; on-going. Cost for FY 24-25 is \$210,176 with \$190,176 for salary and benefits and \$20,000 for initial set-up costs.

2. The County lacks centralized tracking of language access requests and spending.

Recommendation: The County should implement centralized tracking of language access requests and spending, under the responsibilities of the County Language Access Authority.

Cost: 0.25 FTE; on-going. Cost for FY 24-25 is \$48,000.

3. While the County has BPO contracts for language access, the level of awareness of them, the quality of services delivered, and the level of utilization across County agencies varies widely.

Recommendations: The County should centralize its language access contracting, with technical oversight provided by the County Language Access Authority, including:

- Examining all current contracts for ways to improve the quality of the services delivered;
- Including quality metrics in future contracts.
 - For virtual and telephonic language access, including a complete list of languages required, as well as a Service Level Agreement regarding the time to connect with an interpreter;
 - For all contracts, including provisions requiring adherence to industry standards and State and Federal laws and regulations regarding the qualifications of translators and spoken and sign language interpreters;

- Adding information on how to access County language access contracts to the training recommended above.

Cost: 0.25 FTE, one-time cost of \$48,000

SERVICE GAPS:

Service gaps were identified as with administrative gaps, with additional information coming from the community engagement focus groups.

- 1. There is a perception among community members that many County agencies lack language services and in-language access to information;**

Recommendation: OOE should develop and execute a comprehensive language access outreach plan to engage with Community-Based Organizations, regarding the County Language Access Policy and Plan, the civil right to language access as guaranteed by California and Federal laws and regulations, and how residents can obtain language access when engaging with County agencies.

Cost: 0.5 FTE, on-going. Cost for FY 24-25 is \$96,000.

- 2. County telephone menus have no options for phone-based assistance in non-English/Spanish languages;**

Recommendation: The County of Sonoma should work with its telephone providers to install a module to help with language identification; several commercial options are available.

Cost: 1 FTE, depending on the scope of telephone contracts and the number of agencies that require this; one-time cost of \$191,000.

- 3. Community members noted a complete absence of professional interpretation services in languages like Mixteco, Triqui, Chatino, Tagalog, Fijian, etc.**

Recommendation: As noted above, contracts for language access should specify all languages known to occur in the County, as well as including a requirement to provide any other language which may arise. This is a standard practice in language

access, and all of the languages listed here can be provided by language services companies, at least in telephonic or remote mode.

Cost: TBD, as this depends on the level of demand for specific languages and the cost structures of any language access contractors. A survey can be conducted among County agencies to establish a baseline of current costs associated with the provision of language access. This would be an on-going cost.

4. Community members noted a lack of access assistance with understanding/completing English forms;

Recommendation: Sight Translation and document assistance should be included in the modes of language access offered by the County.

Cost: TBD, as this depends on the level of demand for specific languages and documents and the human resources needed to provide access. A survey can be conducted among County agencies to establish a baseline of current costs associated with the provision of language access. This would be an ongoing cost.

5. Community members and some County language access leads noted that translations of County documents often include confusing bureaucratic processes and terminology, both of which may be unfamiliar to immigrants to the County;

Recommendation: The County and its agencies should examine how materials are written in English, striving for clarity and readability. This will assist translators when these documents are rendered in another language. However, it is likely that some level of legal and technical language will remain in County documents and forms. Therefore, the County should work with Community-Based Organizations as part of its outreach to them, to help explain commonly used forms and documents in terms understood by community members.

Cost: This is covered above, under the recommendation for service gaps.

6. Community members noted that COVID-19 testing/vaccine access information not accessible without language support;

Recommendation: The County should make such information available in multiple languages, ideally by translating materials in to the top 10 languages in the County (See County Demographic Analysis for languages), and providing short videos in

Indigenous languages, through language services contractors or qualified County employees.

Cost: 0.25 FTE; cost would be periodic, as materials and forms are reviewed and revised. Cost of \$48,000.

- 7. Community members noted that there is no existing infrastructure to consistently engage community liaisons from marginalized linguistic groups.**

Recommendation: This is covered above, under the recommendation for service gaps.

Cost: This is covered above, under the recommendation for service gaps.

SERVICE LIMITATIONS:

- 1. As noted in the Demographic report for this project, Spanish is the only language in which the County is obligated to provide translations of vital documents as defined in Executive Order 13166. However, given the linguistic diversity of the County, this creates the gap noted above with respect to availability of documents in other languages. Considering the linguistic diversity of the County, there are a significant number of languages of lesser diffusion, with relatively few speakers of each language present in the County. These circumstances contribute to fiscal limitations, as it may not be fiscally feasible to provide translations in every language present in the County, even if desired;**

Recommendations: Sight Translation and document assistance should be included in the modes of language access offered by the County.

Cost: TBD, as this depends on the level of demand for specific languages and documents and the human resources needed to provide access. A survey can be conducted among County agencies to establish a baseline of current costs associated with the provision of language access. This cost would be ongoing.

- 2. For certain languages of lesser diffusion, the speakers of that language may not have literacy in the language, depending on their level of schooling in their country of origin, and whether the language has a written form.**

Recommendation: The County’s language access services should include the provision of short, in-language videos on key topics, in languages where literacy may be limited.

Cost: 0.5 FTE, this cost would be one time then periodic and variable as documents, policies, and forms are revised and as new populations move into the County. Initial one-time cost of \$96,000, the periodic costs TBD.

3. As noted above, natural disasters pose specific challenges:

- a. Geography and cellular and internet access;**
- b. Language access personnel may be impacted themselves by a disaster and thus be unavailable to provide language access.**

Recommendation: The County should seek technical assistance from the US Department of Homeland Security on best practices in language access during natural disasters.

Cost: Minimal.

CONCLUDING REMARKS

In conclusion, while the County of Sonoma demonstrates a general understanding of and commitment to providing language access, there are clear gaps and limitations that need to be addressed. Centralizing language access efforts under a County Language Access Authority, improving contracting, expanding outreach and engagement with community organizations, addressing gaps in translations and interpretations, and planning for disasters can significantly improve access and equity. By implementing the recommendations outlined above, the County of Sonoma will be better positioned to serve its diverse linguistic communities in line with federal and state laws. Moving forward with purposeful language access efforts will require commitment of resources, but will lead to more just and equitable access to vital services.

PLAN OVERVIEW:

The County of Sonoma Language Access Plan will transform language access for County residents through transformational change to the approach to and infrastructure for language access in the County.

In Year 1, the County will:

- Establish a single County point of contact for language access oversight and support;
- Coordinate centralized resources for the provision of language access;
- Develop a countywide budget for language access, for appropriation in FY25-26;
- Begin developing sustaining relationships with Community-Based Organizations (CBOs) in the County to assist the County in:
 - Proactive outreach to LEP populations regarding the availability of language access services;
 - Developing language access resources, especially by training interpreters in Indigenous languages and other languages of lesser diffusion;
- Report to the residents of the County on the implementation of the Language Access Plan.

In Year 2, the County will

- Appropriate funds to support language access across all County agencies and offices;
- Train all staff on the County's language access policy and plan
- Report to the residents of the County on the implementation of the Language Access Plan.

COUNTYWIDE ACTIONS

1. The County of Sonoma will adopt a final Language Access Policy and Plan by May 2024.
2. The County of Sonoma will assign responsibility for administration and oversight of the Language Access Policy and Plan to the Office of Equity by May 2024.
 - i. Under this responsibility, the County of Sonoma will task OOE to develop countywide mechanisms to implement the language access policy of the County.
3. The County of Sonoma will develop a budget for language access by June 1, 2024, for appropriation in FY24-25.
4. The County of Sonoma will appropriate funds for administering and overseeing language access for FY24-25 to the Office of Equity (OOE).

OOE ACTIONS

1. OOE will develop countywide mechanisms to implement the language access policy of the County of Sonoma by January 2025, including the following:
 - a. Hiring a Language Access Coordinator, with responsibility and resources to implement the County's language access policy and plan (August 2024)
 - b. Developing a "one stop shop" for language access for County of Sonoma government stakeholders, including:
 - i. Technical assistance for County agencies;
 - ii. Practical information on how to use countywide language access resources, including FAQs as well as user-friendly links to County language access contractors;
 - iii. A language access helpline.
2. OOE will develop countywide language access services RFPs by August 2024 to cover:
 - a. Remote interpreting services
 - b. Website localization services
 - c. Document translation services
 - d. In-person interpreting services.

In developing the RFPs for remote and in-person interpreting services, OOE will include best practice guidance for language access in natural disasters, as developed by the US Department of Homeland Security, Office of Civil Rights.

Additionally, in developing RFPs for language access, OOE will incorporate guidance on best practices for language access in Indigenous languages, and will consult with Community-Based Organizations which work with Indigenous language communities in the County.⁵

3. OOE will award countywide language access contracts, per OOE action item 2, by December 2024. It is expected that multiple vendors may be required to cover all languages present in the County, and to cover all of the geographic regions of the County.
4. OOE will develop a complaints process by December 2024, to include:
 - a. A formal, web-based language access complaint form, available at a minimum, in English and Spanish, with language access notification in the

⁵ For example, see the DHS Draft Indigenous Language Access Plan: <https://www.dhs.gov/publication/dhs-indigenous-languages-plan>

- top 10 languages spoken in the county (that is, notices to the effect that the complaint form can be completed with assistance in other languages upon request);
- b. A formal process to investigate and adjudicate language access complaints, consistent with County ordinances and California and Federal laws and regulations;
 - c. Community outreach to CBOs to enable third-party, no-fault reporting of language access challenges. This function will not include the resolution of complaints of disparate treatment or disparate impact, but will serve as an additional source of information to continuously improve language access.
5. OOE will develop staff training on language access for all County employees by February 2025. Staff training will include:
- a. An overview of County, State, and Federal laws, regulations, and policies pertaining to language access;
 - b. Concise information on the linguistic and cultural diversity of the County of Sonoma;
 - c. Concise information on the following motivations for the provision of language access:
 - i. Civil rights requirements under California and Federal laws and regulations;
 - ii. The benefits of providing language access, including improvements in the delivery of County services, increased engagement with County residents, among other benefits;
 - iii. The social justice imperative in delivering language access, as essentially any resident or visitor requiring language access is disadvantaged in comparison to those who do not require language access;
 - d. Concise and practical “how-to” information for frontline staff and their managers, on the following topics:
 - i. How to determine when language access is required, with the default being to offer language access if any concern exists regarding effective communication in English;
 - ii. How to access centralized County resources, such as Over the Phone Interpreting (OPI) services and Virtual Remote Interpreting (VRI) services;
 - iii. Additional requirements and challenges in providing language access to Indigenous language speakers, who may present with Spanish names and may have a geographic origin in a Spanish-speaking country, but who are not Spanish speakers. These individuals may require:

1. Relay interpreting (to and from their Indigenous language into Spanish, then to and from Spanish into English);
 2. Sight translation of written material in English or Spanish into their indigenous languages;
 3. Reading materials written in their languages aloud, as many Indigenous speakers come from countries with no education in their language and may thus lack literacy in the language;
 - e. Concise information on why the use of minor children, other family members, and community members brought in by the resident are not allowed except in exceptional, emergent circumstances;
 - f. Common mistakes and misperceptions in the provision of language access;
 - g. The complaint process for language access complaints.
6. OOE will deliver staff training to all county employees by December 2025.
 7. OOE will deliver community outreach on the County Language Access Plan, starting in September 2024, and continuing through December 2025. This will include:
 - a. Partnerships with Community-Based Organizations to facilitate outreach, promote language access, and provide practical information to community members;
 - b. Exploring pilot programs with Community-Based Organizations and local interpreter trainers to identify and train potential Indigenous Language interpreters;
 8. OOE will regularly collect data on the provision of language access in the County, including:
 - a. Data from each County agency and office on language access provided;
 - b. Data on how language access was provided, including
 - i. County bilingual employees
 - ii. County staff interpreters
 - iii. Contract interpreters (local on site; over the phone, and virtual remote)
 - c. Cost of providing language access

Data will be reported by language, department/agency, geographic location, and type of delivery.

OOE will develop its data collection plan by October 2024, and implement in January 2025.

9. OOE will prepare annual reports for the Board of Supervisors on the implementation of the County Language Access Plan.